

201-14302

Nguyet Phan

02/14/2003 06:39 AM

To: NCIC HPV

CC:

Subject: Comments on Eastman Chemical's test plan for Solvent C (C4 Aldehydes)

Nguyet Phan  
ASRC Aerospace  
OPPT Docket  
EPA Docket Center

----- Forwarded by Nguyet Phan/DC/USEPA/US on 02/14/03 06:39 AM -----

Jessica Sandler <jessicas@peta.org> on 02/13/2003 06:31:27 PM



To: oppt.ncic@epamail.epa.gov, hpv.chemrtk@epamail.epa.gov, Rtk Chem/DC/USEPA/US@EPA, Karen Boswell/DC/USEPA/US@EPA, deyo@eastman.com

cc:

Subject: Comments on Eastman Chemical's test plan for Solvent C (C4 Aldehydes)

Attached please find the comments of the American animal protection community on Eastman Chemical's test plan and revisions for Solvent C.

Jessica Sandler, MHS  
Federal Agency Liaison  
People for the Ethical Treatment of Animals  
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HPV test plan comments -- Eastman.pdf

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February 13, 2003

Christine Todd Whitman, Administrator  
U. S. Environmental Protection Agency  
Ariel Rios Building  
Room 3000, #1101-A  
1200 Pennsylvania Ave., NW  
Washington, DC 20460

Subject: Comments on Eastman Chemical's Test Plan for Solvent C

Dear Administrator Whitman:

The following comments on Eastman Chemical's test plan for Solvent C are submitted on behalf of People for the Ethical Treatment of Animals, the Physicians Committee for Responsible Medicine, the Humane Society of the United States, the Doris Day Animal League, and Earth Island Institute. These health, animal protection, and environmental organizations have a combined membership of more than ten million Americans.

Eastman Chemical provides a thoughtful, thorough test plan and analysis that characterizes the hazard of these chemicals for the HPV Program. They have quantitatively characterized the hazards associated with all the chemicals that comprise solvent C, and have taken the second, important step of comparing these hazards with the amount of exposure to this complex solvent. Eastman Chemical has relied on a weight of evidence approach that includes exposure assessment rather than automatic check-the-box testing, the preferred route of both the EPA and Environmental Defense.

Eastman makes the excellent point that due to the variable composition of solvent C, further animal testing of the mixture will provide little useful information beyond the information provided on the individual chemicals. In short, the variability of further animal testing of this compound would be greater than the variability of toxicity based on existing data, and thus would provide no useful information in better characterizing the hazards associated with this complex mixture. Eastman's proposal to conduct no further animal testing therefore complies with the October 1999 agreement to reduce the number of animals killed in this program which states in part, that a "thoughtful, qualitative analysis" should be used rather than "a rote checklist approach. Participants may conclude that there is sufficient data, given the totality of what is known about a chemical... that certain endpoints need not be tested." The agreement further states that additional testing should not be conducted when the information obtained would not be "useful or relevant."

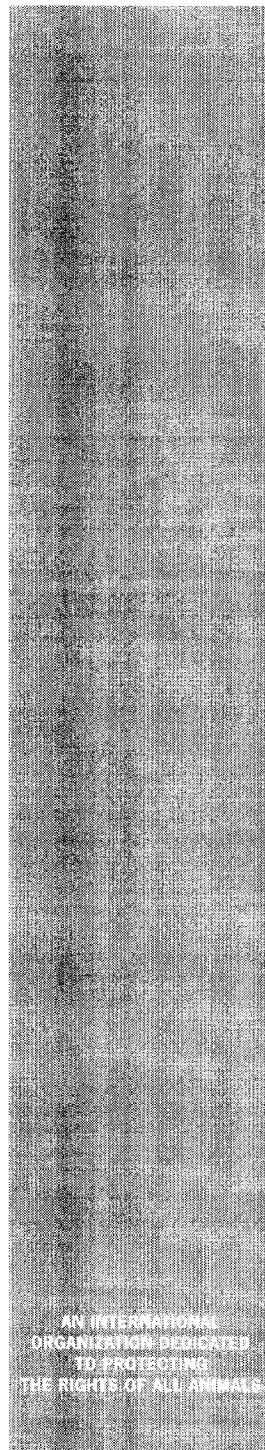
We applaud Eastman's efforts in characterizing the toxicity of Solvent C, and encourage EPA to adopt Eastman's example in characterizing other complex



**PETA**

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THE RIGHTS OF ALL ANIMALS

mixtures of chemicals. We believe that applying this thorough, quantitative analysis improves the hazard identification process of the HPV program, streamlines the program and reduces the cost of the program, both financially and in terms of animal lives.

Thank you for your attention to these comments. I can be reached at 757-622- 7382, ext.1304, or via e-mail at [JessicaS@peta.org](mailto:JessicaS@peta.org).

Sincerely,

Jessica Sandler, MHS  
Federal Agency Liaison